

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

KTM AG,

Plaintiff,

v.

THE INDIVIDUALS, CORPORATIONS,  
LIMITED LIABILITY COMPANIES,  
PARTNERSHIPS, AND  
UNINCORPORATED ASSOCIATIONS  
IDENTIFIED ON SCHEDULE A HERETO,

Defendants.

Case No.: 21-cv-1279

Judge Robert M. Dow, Jr.

**PLAINTIFF'S MOTION FOR ENTRY OF A PRELIMINARY INJUNCTION**

Plaintiff KTM AG hereby moves this Honorable Court for entry of a Preliminary Injunction. The scope of the Preliminary Injunction is substantially identical to the Temporary Restraining Order entered on April 28, 2021 [Dkt. No. 19] and extended on May 12, 2021 for an additional fourteen days to May 26, 2021 [Dkt. No. 24]. In support of its Motion, Plaintiff files the accompanying Memorandum of Law and Declaration of Michael A. Hierl.

Respectfully submitted,

Dated: May 17, 2021

By: s/Michael A. Hierl  
Michael A. Hierl (Bar No. 3128021)  
William B. Kalbac (Bar No. 6301771)  
Robert P. McMurray (Bar No. 6324332)  
Hughes Socol Piers Resnick & Dym, Ltd.  
Three First National Plaza  
70 W. Madison Street, Suite 4000  
Chicago, Illinois 60602  
(312) 580-0100 Telephone  
[mhierl@hsplegal.com](mailto:mhierl@hsplegal.com)  
[wkalbac@hsplegal.com](mailto:wkalbac@hsplegal.com)  
Attorneys for Plaintiff  
KTM AG

**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies on May 17, 2021 that a true and correct copy of the foregoing document was filed electronically with the Clerk of the Court and served on all counsel of record and interested parties via the CM/ECF system.

/s/ Michael A. Hierl